

### **REMARKS**

In this Response to the above-identified Final Office Action, Applicants do not amend the application, but submit the following remarks and seeks reconsideration thereof. In this Response, no claims have been added, no claims have been cancelled, and no claims have been amended. Accordingly, Claims 1-22 are pending.

#### **I. Final Action Premature**

Applicants submit that the finality of the Examiner's rejection is premature at least for the reason that a new ground of rejection was made for the first time in this action in regard to all pending claims. The Examiner's new ground of rejection is neither necessitated by Applicants' amendment of the claims, as Applicants have made none, nor based on information submitted in an IDS. See MPEP § 706.07(a). Accordingly, Applicants respectfully request that the finality of the rejection be withdrawn.

#### **II. Claims Rejected Under 35 U.S.C. § 103(a)**

Claims 1-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,935,247 issued to Pai *et al.* ("Pai") in view of the article "AGP Video System Memory Access" published by the PC Guide ("the PC Guide"). Applicants respectfully disagree for the following reasons.

In regard to claims 1, Applicants submit that neither Pai nor the PC Guide, separately or in combination, teaches or suggests system memory including an isolated output area. Rather, Pai teaches a display buffer driven by a video display card (Fig. 1 and col. 3, lines 61-63), and the PC Guide teaches the sharing of system memory with a video chipset. Combining Pai with the PC Guide would at most place the video card memory in the system memory but would not isolate a portion of the system memory to include an isolated output area.

Applicants further submit that the Examiner improperly combines Pai with the PC Guide. The Examiner admits that Pai does not disclose that the video card memory (i.e., the display buffer) is in the system memory, but seeks to use the PC Guide to cure this defect. However, modifying

Pai to place the display buffer in the system memory would render the display buffer accessible (i.e., non-isolated) by processes or devices that share access to the system memory. Applicants note that the technology for isolating the system memory is fundamentally different from protecting the buffer located in a peripheral device such as a video card because the nature and function of the two memory devices so require. Thus, absent any teaching or suggestion to isolate at least a portion of the system memory, a display buffer placed in the system memory cannot constitute "an isolated output area." Thus, Applicants submit that combining Pai with the PC Guide would render Pai's system unable to prevent unauthorized access to the genetic code temporarily stored in the display buffer (col. 5, lines 41-44). As the proposed combination would render the system taught by Pai unsatisfactory for its intended purpose, the combination is inappropriate. See MPEP 2143.01.

Additionally, Applicants respectfully contend the Examiner's characterization of a monitor as the isolated output area of the system memory. A monitor is a peripheral device and its memory is peripheral memory. According to common knowledge in the art, peripheral memory is physically separated from system memory and is generally implemented with technology specially suited for the function of the peripheral device. Thus, a monitor or its memory cannot be a part of the system memory.

For at least the reasons set forth above, Pai in view of the PC Guide does not render claim 1 obvious. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 1 are requested.

In regard to claim 12, Applicants note that the claim stand rejected under 35 U.S.C. § 103(a) over Pai because only Pai is cited in this rejection. Applicants submit that Pai at least fails to teach or suggest an isolated mode. At most, Pai teaches preventing direct access to the genetic code memory by processors or master devices (col. 2, lines 57-60). This access is prevented at all times, contrary to the claimed method which prevents access based on the mode in which a requester operates. Thus, Pai does not teach or suggest an isolated mode in connection to the access to the genetic code memory.

Although not specifically pointed out by the Examiner, Applicants note that Pai discloses disabling a switch device to prevent access to the display buffer (col. 5, lines 43-44). Contrary to the claimed method which prevents access based on the mode in which a requester operates, the disabled switch indiscriminatorily blocking off access to the display buffer by all the devices connected to the switch. Thus, Pai does not teach or suggest an isolated mode in connection to the access to the display buffer.

Thus, the Examiner has not shown and Applicants have been unable to identify the existence of an isolated mode in the teaching of Pai. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 12 are requested.

In regard to claim 17, Applicants resubmit the outstanding arguments from the prior responses, noting that the Examiner reasserts the same position in the Final Office Action without addressing Applicants' arguments. It appears that the Examiner has not considered the arguments previously submitted. Those arguments are reproduced below.

Applicants respectfully submit that Claim 17 depends on Claim 16, which in turn depends on Claim 13 following the dependency tree, one is able to discern that the windows occluded are all windows other than the window defined in the defining element of Claim 17, which is the window into which the isolated output area data from the bit plane on the graphics card is loaded. Stated differently, all non-isolated mode windows are occluded responsive to entry into the isolated mode. Accordingly, Applicants respectfully submit that the official notice of ATM machines, even if well taken, and even if it did render obvious, "to one of ordinary skill in the art [to] occlude the image prior to transitioning out of isolated execution mode, in order to preserve the security information being displayed," is inapposite here. Applicants respectfully submit that it is not the occlusion of information transitioning out of isolated execution mode that is being claimed. Rather, in Claim 17, the occlusion of other windows upon the entrance into isolated execution mode that is claimed. It is respectfully made for this additional reason, rejection of Claim 17 should be withdrawn.

In regard to claim 19, Applicants note that the claim stand rejected under 35 U.S.C. § 103(a) over Pai because only Pai is cited in this rejection. Applicants respectfully submit that at a

minimum, Paj fails to teach or suggest accessing an isolated output area in connection with the operations of a direct memory access (DMA) controller issuing a request to a memory control hub (MCH). Applicants have been unable to identify such a teaching in the cited passages or elsewhere in Paj. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 19 are requested.

Since all independent claims have been shown to be patentable over the reference of record, their dependent claims are at least patentable as dependent on a patentable independent claim. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 1-11, 13-18, 20-22 are also requested.

**CONCLUSION**

In view of the foregoing, it is believed that all claims now pending, namely claims 1-22 patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207 3800.

Respectfully submitted,

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**CERTIFICATE OF TRANSMISSION:**

*I hereby certify that this paper is being facsimile transmitted to the U.S. Patent and Trademark Office on March 29, 2005.*

  
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